

EXHIBIT A



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Linn Clagett
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VIA CERTIFIED MAIL
RETURN RECEIPT REQUESTED

December 13, 2018

Adam Victor
Manhattan Place Condominium
C/o AJ Clarke Real Estate
1881 Broadway
New York, NY 10023

RE:	Insured(s):	Manhattan Place Condominium
	Policy No.:	074-LB-104764209
	Reference No.:	197-DON-T1802605-RG
	Subject:	Yevgeniya Khatskevich

Dear Board:

The purpose of this letter is to notify you that in regards to the above-referenced matter, Travelers Casualty and Surety Company of America ("Travelers") has reassigned from the previous adjuster to my attention for handling. This letter further seeks to set forth Travelers' expectations for the handling of this matter going forward.

As you are aware, Travelers issued the captioned Policy to Manhattan Place Condominium ("MPC") for the Policy Period 06/30/2013 to 06/30/2014. The Annual Aggregate Limit of Liability under the Policy is \$2,000,000.00. Defense Costs reduce and may exhaust the Limit of Liability. The Policy, as amended by Endorsement CIRI-70072 NY (02-02) Separate Retention for Wrongful Employment Practices Claims, contains a \$15,000.00 deductible, which for the purposes of this matter applies to Loss, inclusive of Defense Costs.

Initially, please note Travelers wishes to discuss this claim with the Board of Directors for Manhattan Place Condominium and requests that it contacts Travelers at its earliest opportunity to schedule a conference call. Please reach me at 407.388.2953 or LClagett@travelers.com.

Next, it was recently brought to our attention by Jeffrey Eilender, of Schlam Stone & Dolan LLP, that the Board has hired him as new counsel for Manhattan Place Condominium and Mr. Adam Victor in his capacity as a Board of Director.

Please note the Policy contains the following agreement in section I.B.:

***** Our toll-free number is 800-842-8496 *****
If possible, please send future communications and documents concerning this claim via email to SHALBRUN@travelers.com Please include the claim number in the subject line. (Please note that in certain cases we may still request original documents).

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The Insurer shall have the right and duty to defend any Claim covered by this Policy, even if any of the allegations are groundless, false or fraudulent. The Insured shall have the option to select the defense attorney, or to consent to the Insurer's choice of defense attorney, which consent shall not be unreasonably withheld. The Insurer's duty to defend shall cease upon exhaustion of the Limit of Liability set forth in Item 3 of the Declaration.

The Insureds agree to provide the Insurer with all information, assistance and cooperation which the Insurer reasonably request and agree that in the event of a Claim the Insureds will do nothing that may prejudice the Insurer's position or its potential or actual rights of recovery.

We note the prior claims adjuster requested that the Board contact him prior to changing counsel, which the Board failed to do. We direct your attention to the above which provides the Insureds will cooperate as Travelers reasonably requires. Going forward, we ask for compliance in regard to claim adjuster requests.

While MPC has the right to select counsel based on the language of the policy, any fees associated with Schlam Stone & Dolan's review of the nearly 5-year litigation will not be covered under the Policy, as these fees will be deemed unreasonable having already paid for Nelson Mullins' defense fees at the time of tender. Travelers will pay Schlam Stone & Dolan at the following rates: \$300/hr. for partners, \$225/hr. for Associates and \$100/hr. for paralegals. Any amounts charged above those rates will be the responsibility of the Insureds. Travelers expects Schlam Stone & Dolan to comply with its defense guidelines regarding billing and reporting. The undersigned will provide the firm with those guidelines this week.

Travelers continues to fully reserve all rights, remedies, and defenses in this matter, including but not limited to the right to raise any additional terms, conditions and exclusions as defenses to coverage should they later be determined to apply. Neither this letter, nor any actions by Travelers or any of its agents, shall constitute, or be deemed a waiver, estoppel, admission of liability or prejudice of any kind to Travelers' rights and defenses under the Policy, by law, or otherwise.

As discussed above, please contact me to set up a conference call with the Board. Additionally, please do not hesitate to contact us if you have any questions regarding Travelers' coverage position.

Very truly yours,

***** Our toll-free number is 800-842-8496 *****

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Linn Clagett

cc: Katie Bottcher
AON Financial Services Group
Katherine.Bottcher@aon.com

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